## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC. and FELIX ESPOSITO,

v.

Plaintiffs, : CIVIL ACTION NO.

04-12347 (MAP)

DELANCY CLINTON ASSOCIATES, L.P., a Pennsylvania Limited Partnership

Defendant. : MAY 6, 2005

## **DEFENDANT'S MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6, Defendant DELANCY CLINTON ASSOCIATES, L. P. in the above-captioned action hereby respectfully requests this Court for an extension of 30-days, up to and including June 5, 2005, in order to file its initial pleading in this matter. The undersigned has just been retained as counsel in this case and requires time to become familiar with the facts at issue. Plaintiff's counsel does not object to this extension. This is the Defendant's first request for an extension of time in this matter.

ORAL ARGUMENT NOT REQUESTED

Case 3:04-cv-12347-KPN Document 7 Filed 05/09/2005 Page 2 of 3

DEFENDANT – DELANCY CLINTON

ASSOCIATES, L. P.

Michael Colgan Harrington -

#BBO565144

mharrington@murthalaw.com

Murtha Cullina LLP CityPlace I 185 Asylum Street Hartford, Connecticut 06103-3469 Telephone: (860) 240-6000

Its Attorneys

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendant's Motion for Extension of Time was mailed first-class, postage prepaid, on this  $6^{th}$  day of May, 2005 to:

Larry Fuller, Esq.
O. Oliver Wragg, Esq.
Fuller, Fuller and Associates, P.A.
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181

Michael Colgan Harrington

806865